

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

GODO KAISHA IP BRIDGE 1,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 2:21-CV-213-JRG
	§	(Lead Case)
	§	
TELEFONAKTIEBOLAGET LM ERICSSON and ERICSSON INC.,	§	
	§	
	§	JURY TRIAL DEMANDED
Defendants.	§	
	§	
GODO KAISHA IP BRIDGE 1,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 2:21-CV-215-JRG
	§	(Member Case)
	§	
NOKIA CORPORATION, NOKIA SOLUTIONS AND NETWORKS OY, and NOKIA OF AMERICA CORPORATION,	§	
	§	
	§	JURY TRIAL DEMANDED
Defendants.	§	
	§	
	§	

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff Godo Kaisha IP Bridge 1 (“Plaintiff” or “IP Bridge”) and Defendants Nokia Solutions and Networks Oy and Nokia of America Corporation (“Defendant” or “Nokia”) have settled, in principle, all matters in controversy in the above-captioned action between the parties. Accordingly, the parties jointly move the Court to stay any and all unreached deadlines in this action for sixty (60) days in order to finalize the settlement of this matter and file appropriate dismissal papers.

Dated: November 8, 2022

Steven Pepe
(NY Bar No. 2810430)
(Eastern District of Texas Member)
Kevin J. Post
(NY Bar No. 4382214)
(Eastern District of Texas Member)
Alexander E. Middleton
(NY Bar No. 4797114)
(Eastern District of Texas Member)
Matthew R. Shapiro
(NY Bar No. 5102017)
(Eastern District of Texas Member)
Lance W. Shapiro
(NY Bar No. 5397955)
(Eastern District of Texas Member)
ROPES & GRAY LLP
1211 Avenue of the Americas
New York, NY 10036
Telephone: (212) 596-9000
Facsimile: (212) 596-9090
steven.pepe@ropesgray.com
kevin.post@ropesgray.com
alexander.middleton@ropesgray.com
matthew.shapiro@ropesgray.com
lance.shapiro@ropesgray.com

Samuel L. Brenner
(MA Bar No. 677812)
(Eastern District of Texas Member)
ROPES & GRAY LLP
Prudential Tower
800 Boylston Street
Boston, MA 02199-3600
Telephone: (617) 951-7000
Facsimile: (617) 951-7050
samuel.brenner@ropesgray.com

Respectfully submitted,

/s/ Melissa R. Smith

Melissa R. Smith
GILLAM & SMITH, LLP
TX State Bar No. 24001351
303 S. Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257
melissa@gillamsmithlaw.com

James R. Batchelder
(CA Bar No. 136347)
(Eastern District of Texas Member)
Shong Yin
(CA Bar No. 319566)
(Eastern District of Texas Member)
ROPES & GRAY LLP
1900 University Avenue, 6th Floor
East Palo Alto, CA 94303-2284
Telephone: (650) 617-4000
Facsimile: (650) 617-4090
james.batchelder@ropesgray.com
shong.yin@ropesgray.com

Attorneys for Plaintiff
GODO KAISHA IP BRIDGE 1

/s/ John D. Haynes

John D. Haynes
David S. Frist
Siraj Abhyankar
Shawn P. Gannon
Sloane Kyrakis
ALSTON & BIRD LLP
One Atlantic Center
1201 West Peachtree Street, Suite 4900
Atlanta, GA 30309
Telephone: (404) 881-7000
Facsimile: (404) 881-7777
john.haynes@alston.com
david.frist@alston.com
shri.abhyankar@alston.com
shawn.gannon@alston.com
sloane.kyrakis@alston.com

J. Ravindra Fernando
ALSTON & BIRD LLP
One South at The Plaza
Suite 4000
101 South Tryon Street
Charlotte, NC 28280-4000
Phone: 704-444-1000
Fax: 704-444-1111
ravi.fernando@alston.com

Deron Dacus
Shannon Dacus
THE DACUS FIRM, P.C.
821 ESE Loop 323
Suite 430
Tyler, TX 75701
Phone: (903) 705-1117
Fax: (903) 581-2543
ddacus@dacusfirm.com
sdacus@dacusfirm.com

*Counsel for Defendants Nokia of America
Corporation; Nokia Solutions and Networks
OY*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on November 8, 2022.

/s/ John D. Haynes
John D. Haynes

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for the Parties have complied with the meet and confer requirement regarding this Motion. The Parties are in agreement and are seeking joint relief.

/s/ John D. Haynes
John D. Haynes